

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
v.)	CR. NO. 3:07-cr-32-WKW
)	
MICHAEL BAILEY)	

MOTION FOR DOWNWARD DEPARTURE

Comes now the United States of America, by and through Leura G. Canary, United States Attorney for the Middle District of Alabama, and pursuant to the United States Sentencing Commission, Guidelines Manual, Section 5K1.1, and Title 18, United States Code, Section 3553(e), respectfully requests this Honorable Court to downwardly depart two (2) levels, in the sentence that would otherwise be imposed on Defendant Michael Bailey, and as reasons therefore, submits the following:

The United States herein states that the Defendant has provided substantial assistance in investigations of federal narcotics law violations in the Middle District of Alabama.

Wherefore, premises considered, the United States moves this Honorable Court for a downward departure from the calculated guideline range. This motion seeks a departure of two (2) levels.

Respectfully submitted this the 17th day of April, 2008.

LEURA G. CANARY
UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I hereby certify that on April 17, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Michael Petersen.

Respectfully submitted,

LEURA G. CANARY
UNITED STATES ATTORNEY

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